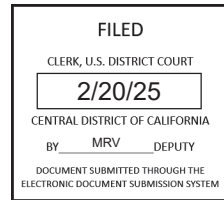


UNDER GOD,

CASE # 2:25-cv-01563-UA



**IN THE UNITED STATES DISTRICT COURT**

**FOR THE CENTRAL DISTRICT OF THE STATE OF CALIFORNIA**

**T. H, on behalf of minor child R.S. III,**

Plaintiff,

v.

**PASADENA UNIFIED SCHOOL DISTRICT (PUSD), PASADENA BOARD OF EDUCATION,**

**STATE OF CALIFORNIA GENERAL SERVICES, and Dr. ELIZABETH BLANCO BRANDI**

**WOJCIECHOWSKI, ALICIA FLORES, MIRIAN MEEHAN, ADRIANA GARCIA, RAFE**

**GOODWELL, OWENS ORDONEZ, RYAN FLORES, ANA DEMARCO, ROBERT GALVAN,**

**AIKATERINI (KATERINA) KALYVIOTI, RENEE CRUZ, JENNIFER HALL LEE, TINA**

**FREDERICKS, KIMBERLEY KENNE, individually and in their personal capacities,**

Defendants.

Case No.: \_\_\_\_\_

**COMPLAINT FOR DECLARATORY RELIEF AND MONETARY DAMAGES**

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**INTRODUCTION**

1

**COMPLAINT FOR DECLARATORY RELIEF AND MONETARY DAMAGES AGAINST  
PASADENA UNIFIED SCHOOL DISTRICT, PASADENA BOARD OF EDUCATION, STATE OF  
CALIFORNIA DEPARTMENT OF GENERAL SERVICES, ET ALL, and does include Doe (1-  
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UNDER GOD,

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1. Plaintiff **T.H.**, on behalf of her minor son **R.S III**, brings this action against **Pasadena Unified School District (PUSD)** sued in it's individual capacity, **Pasadena Board of Education** sued in its personal and individual capacity, **State of California Department of General Services** sued in their personal and individual capacity, and individual school officials **Dr. ELIZABETH BLANCO, BRANDI WOJCIECHOWSKI, ALICIA FLORES, MIRIAN MEEHAN, ADRIANA GARCIA, RAFE GOODWELL, OWENS ORDONEZ, RYAN FLORES, ANA DEMARCO, ROBERT GALVAN, AIKATERINI (KATERINA) KALYVIOTI, RENEE CRUZ, JENNIFER HALL LEE, TINA FREDERICKS, KIMBERLEY KENNE** sued in their personal capacities for violating the **Individuals with Disabilities Education Act (IDEA), the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and 42 U.S.C. § 1983 (Civil Rights Violations).**
2. Defendants, acting **without lawful authority**, unlawfully removed **R.S III** from his **Individualized Education Program (IEP)** despite his documented hearing disability, depriving him of necessary educational services, assistive technology, accommodations, and financial resources **mandated by federal law.**
3. **Defendants lack the legal qualifications to hold their positions due to their failure to provide proof of public fiduciary bonds and sworn oaths of office, as required by law.**

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4. Plaintiff seeks:

- **Declaratory judgment** that Defendants' actions violate IDEA, ADA, and Section 504.
  - **Injunctive relief** reinstating R.S III's IEP, related services, and financial support for tutoring, hearing aids, and necessary accommodations.
  - **Monetary damages** of \$500,000 per day from April 12, 2024, until today (February 20, 2025), totaling **\$157,000,000** for the deprivation of his education and liberty.
  - **An order requiring Defendants, in their personal capacities, to provide proof of their authority to hold office, including valid bonds and sworn oaths, within three (3) days of service of this complaint.**
- 

#### JURISDICTION & VENUE

5. This Court has jurisdiction under:

- **20 U.S.C. § 1400 et seq. (IDEA)**
- **42 U.S.C. § 12101 et seq. (ADA)**
- **29 U.S.C. § 794 (Section 504 of the Rehabilitation Act)**

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- **42 U.S.C. § 1983 (Civil Rights Violations)**

6. Venue is proper in this Court because the acts and omissions complained of occurred within **Pasadena Unified School District, California.**

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## **PARTIES**

7. **Plaintiff T.H** is the mother and legal guardian of minor child **R.S III**, a student with a qualifying disability entitled to protections under federal law.

8. **Defendants** include:

- **PASADENA UNIFIED SCHOOL DISTRICT (PUSD)**
- **PASADENA BOARD OF EDUCATION**
- **STATE OF CALIFORNIA GENERAL SERVICES**
- **Dr. ELIZABETH BLANCO**
- **BRANDI WOJCIECHOWSKI**
- **ALICIA FLORES**
- **MIRIAN MEEHAN**
- **ADRIANA GARCIA**

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- **RAFE GOODWELL**
- **OWENS ORDONEZ**
- **RYAN FLORES**
- **ANA DEMARCO**
- **ROBERT GALVAN**
- **AIKATERINI (KATERINA) KALYVIOTI**
- **RENEE CRUZ**
- **JENNIFER HALL LEE**
- **TINA FREDERICKS**
- **KIMBERLEY KENNE**
- Defendants individually and in their personal capacities, **sued in their individual and personal capacities for acting beyond their lawful authority.**

9. **Defendants are unlawfully occupying their positions without proof of public bonds or lawful delegation of authority.** They have engaged in discrimination and procedural violations by unlawfully removing **R.S III's IEP** without due process and in violation of the rule of law.

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10. Defendants are required to provide proof of their lawful authority to hold office, including valid surety bonds and sworn oaths of office, within three (3) days of service of this complaint.
- 

## FACTUAL BACKGROUND

### A. R.S III's Disability & Entitlement to Special Education Services

11. R.S III has a **documented unilateral hearing loss** in his left ear, confirmed by multiple **audiological and educational assessments**.
12. Under **34 C.F.R. § 300.8(a)** (IDEA regulations), students with hearing impairments are **automatically entitled to an IEP**, ensuring they receive **specialized instruction, assistive technology, and necessary accommodations**.
13. Defendants were required by law to provide the following services:
- Hearing aids and assistive technology (e.g., FM systems, captioning devices).
  - Tutoring and educational support.
  - Classroom modifications for accessibility.
  - Speech therapy and other related services.

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14. **Defendants' failure to provide these accommodations has resulted in significant academic setbacks for R.S III, violating his rights under federal disability law.**

**B. Unlawful Removal of R.S III's IEP & Denial of Services**

15. **On April 12, 2024, Defendants removed R.S III from special education services under the false claim that his hearing loss did not impact his education.**

16. This removal was:

- **Unlawful**, as it contradicted multiple **prior assessments** confirming his disability.
- **Conducted without parental consent**, violating **IDEA's procedural safeguards**.
- **A direct violation of R.S III's federally protected rights**, denying him tutoring, hearing aids, and assistive technology.

17. **Defendants acted outside their lawful authority and failed to provide proof of their official capacity, violating due process.**

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**CAUSES OF ACTION**

**COUNT I – VIOLATION OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT (IDEA)**

**(20 U.S.C. § 1400 et seq.)**

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18. IDEA **guarantees students with disabilities a Free Appropriate Public Education (FAPE)** and prohibits schools from removing services **without due process**.

19. **Defendants violated IDEA by:**

- **Unlawfully revoking R.S III's IEP** without legal justification.
- **Failing to provide required accommodations**, including hearing aids and tutoring.
- **Denying procedural safeguards**, such as proper evaluation before terminating services.

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## RELIEF REQUESTED

WHEREFORE, Plaintiff demands the following relief:

A. **Declaratory Judgment** stating that **Defendants violated IDEA, ADA, and Section 504**.

B. **Injunctive Relief** requiring Defendants to:

- **Immediately reinstate R.S III's IEP**.
- **Provide compensatory education, tutoring, and necessary accommodations**.
- **Cover all costs for assistive technology (hearing aids, FM systems, captioning services, etc.)**.

C. **Monetary damages** of **\$500,000 per day** from April 12, 2024, totaling

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**COMPLAINT FOR DECLARATORY RELIEF AND MONETARY DAMAGES AGAINST PASADENA UNIFIED SCHOOL DISTRICT, PASADENA BOARD OF EDUCATION, STATE OF CALIFORNIA DEPARTMENT OF GENERAL SERVICES, ET ALL, and does include Doe (1-**

**10)**



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**\$157,000,000** for deprivation of education and liberty.

**D. An order requiring Defendants, in their individual capacities, to provide proof of their authority to hold office, including valid bonds and sworn oaths, within three (3) days.**

**DATED:** 2/20/2025

Respectfully submitted,



**T.H**

600 Lincoln Ave.

Pasadena, Ca 91103

Sui Juris, Plaintiff